

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**RACHEL HATTON,**  
*Plaintiff,*

**V.**

**HARRIS COUNTY JAIL AND  
HARRIS COUNTY SHERIFF'S  
DEPARTMENT AND HARRIS COUNTY**  
*Defendants.*

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**CIVIL ACTION NO. 4:18-CV-\_\_\_\_\_**

**JURY DEMAND**

**DEFENDANT HARRIS COUNTY'S NOTICE OF REMOVAL**

Defendant Harris County files this Notice of Removal pursuant to 28 U.S.C. § 1441, and would respectfully show as follows:

1. Plaintiff Rachael Hatton ("Plaintiff") filed her Original Petition on May 3, 2018 under Cause No. 2018-30004, in the 234<sup>th</sup> Judicial District Court of Harris County, Texas. Defendants Harris County Jail and Harris County Sheriff's Department have not been served.

2. Defendant's notice of removal is filed within thirty (30) days after Harris County received notice of the Petition. Plaintiffs alleges the cause of actions against Defendants pursuant to 42 U.S.C. § 1983. Plaintiff brought this action for constitutional violations and state law personal injuries suffered by Plaintiff as a result of assault and battery and excessive force used against her.. Plaintiff seeks damages, attorney's fees and costs. Original jurisdiction of this Court is proper pursuant to 28 U.S.C. §§ 1441(a) and 28 U.S.C. § 1331. Venue in this Court is proper because Harris County, Texas is located within the Southern District of Texas and the Houston Division thereof. Removal to this Court is, therefore, proper under U.S.C. §§ 1441(a) and 1331. All defendants who have received notice consent to this removal.

3. Copies of all process and pleadings filed in Cause No. 2018-30004 have been provided to this Court.

4. Written notice of the filing of this Notice is being served on all adverse parties as required by 28 U.S.C. § 1446(d). A true and correct copy of this Notice will be filed with the District Clerk of Harris County, Texas, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant Harris County respectfully requests that this action be removed to the United States District Court.

Respectfully submitted,

OF COUNSEL:

VINCE RYAN  
HARRIS COUNTY ATTORNEY

/S/ Mary E. Baker  
MARY E. BAKER  
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ATTORNEY FOR DEFENDANT  
HARRIS COUNTY

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2018, a true and correct copy of this pleading was served by facsimile and/or electronically to:

Joseph Ward  
Ahmad G. Azam  
Azam, Ward & Sullivan, PLLC  
9894 Bissonnet St., Ste. 905  
Houston, Texas 77036  
Fax: (832) 203-4477  
[info@awspllc.com](mailto:info@awspllc.com)

**/S/ Mary E. Baker**  
MARY E. BAKER  
Senior Assistant County Attorney